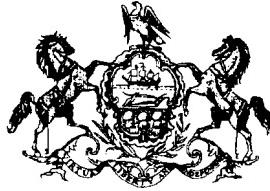


# *Exhibit A*



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

May 11, 2006

TOM CORBETT  
ATTORNEY GENERAL

Office of Attorney General  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Ave.  
Pittsburgh, PA 15219  
(412) 565-3520  
(412) 565-3019(Fax No.)

Anthony DeFranco, CZ-3518  
State Correctional Institution  
At Albion  
10745 Route 18  
Albion, PA 16475

RE: Anthony DeFranco v William Wolfe, et al., C.A. No. 04-230 E

Dear Mr. DeFranco:

Enclosed please find ***Defendants' Response to Plaintiff's Second Request for Production of Documents*** in the above-captioned case.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mary Friedline".

Mary L. Friedline  
Senior Deputy Attorney General

MLF/cdc  
Enclosures

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA

ANTHONY DeFRANCO,  
Plaintiff,

v.

WILLIAM WOLFE, et al.,  
Defendants.

:  
: No. C.A. 04-230-E  
: Magistrate Judge Baxter  
: District Judge Cohill  
:  
:  
:

---

DEFENDANTS' RESPONSE TO  
PLAINTIFF'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS

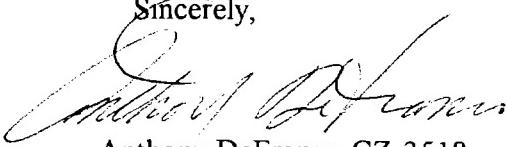
Pursuant to Rule 26 and Rule 34 of the Federal Rules of Civil procedure, plaintiff requests that the defendants produce the following documents. Please produce the documents at plaintiff's place of confinement at, 10745 Route 18, Albion, Pa. 16475-0002.

1. Please present all of the vote sheets involving plaintiff transfers in 2005. Under D.O.C. policy, a vote sheet is to be prepared before transfer. The vote sheets for transfer in 2005.  
SEE ATTACHED SHEET FOR RESPONSES.
2. Please present the unit log sign-in sheet, for staff, on D/A unit for the week of September 23-28, 2002. These sign-in logs are for staff who visit the unit each day.
3. Please provide all block report records (commonly known as a CAR)—these block reports are used to log in inmates behavior.
4. Dates and where plaintiff was housed at Albion from May 1, 2002 through June 30, 2002.
5. How many psychologist spoke with plaintiff, and who, from March 26, 2002 until June 25, 2002; list dates.
6. All information in plaintiff's file regarding his z-code from SCI Smithfield. All information regarding the z-code from SCI Smithfield.

Date: April 9, 2006  
enc. copy of 4/3/06 request to  
defendants for inspection of files.

**Certificate of service**  
Service of the foregoing was  
made this date to the Attorney  
General's Office, 564 Forbes Ave.,  
Pgh., Pa. 15219.

Sincerely,



Anthony DeFranco CZ-3518  
10745 Route 18  
Albion, Pa. 16475-0002

*Defendants' Response to  
Plaintiff's Second  
Request for Documents  
Number 4*



cr3datctrweb02

## Pennsylvania Department of Corrections

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## Inmate Inquiry - Cell History

Production

DOC Info

[Inmate Apps](#)[Inmate Inquiry](#)[Reports](#)[Photos](#)[JNET](#)

Inmate #: CZ3518 ACTIVE

Name: DEFARNO, Anthony Wayne

Cust Lvl: 3 Prog Cd: Y , Z

Perm Loc: Albion

Assessment

DOB: 12/23/1963 Sex: Male

Housing Unit: D -A -1031-01

Temp Loc:

Race: White

FBI #: 242913AA6 PBPP #:

Counselor: Webb, Karla Jean

SID: 149-70-82-7

Community Corrections System

Detainers: YES

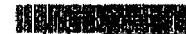
Green Sheet:

Problematic offense: YES

Correspondence Tracking  
Location Building Section  
DCCCell  
Dorm.Bed  
No.House  
StatusSec.  
LevelCust.  
Level

Date In

Date Out



## Inmate Employment

PIT

Hold

08/31/1998 10/20/1999

Inmate Status

Hold

10/20/1999 10/20/1999

029 BT 06

BUS

10/20/1999 10/20/1999

SM Integrated Case Summary

Hold

10/20/1999 10/20/1999

024 Nick Names V1

29

BUS

10/20/1999 10/20/1999

ALB RTSP

Hold

10/20/1999 10/20/1999

ALB J B 1030

02

4

3

10/20/1999 10/26/1999

ALB Sentencing

Hold

10/26/1999 10/26/1999

ALB Transfer Petition

A 2063

01

3

3

10/26/1999 12/03/1999

ALB Unit Management

A 2064

02

3

3

12/03/1999 03/04/2000

ALB Visitor Tracking

Hold

12/03/1999 12/03/1999

ALB A 1029

01

3

3

03/04/2000 07/14/2000

ALB H C 2023

01

RHU

5

5

07/14/2000 07/19/2000

ALB F A 1029

01

3

3

07/19/2000 03/27/2002

ALB H B 1009

01

RHU

5

5

03/27/2002 04/25/2002

ALB J A 2058

01

4

4

04/25/2002 05/14/2002

ALB Hold

Hold

04/25/2002 04/25/2002

ALB J A 1023

01

4

4

05/14/2002 06/24/2002

ALB C A 1032

01

3

4

06/24/2002 07/12/2002

ALB Hold

Hold

07/12/2002 07/12/2002

ALB H D 2022

01

RHU

5

5

07/12/2002 08/15/2002

ALB J B 1021

01

4

4

08/15/2002 08/19/2002

ALB D A 2057

02

3

4

08/19/2002 08/22/2002

ALB Hold

Hold

08/22/2002 08/22/2002

ALB D A 2057

01

3

4

08/22/2002 01/02/2004

ALB Hold

Hold

01/02/2004 01/05/2004

ALB D A 2057

01

3

3

01/05/2004 05/12/2004

ALB Hold

Hold

05/12/2004 05/12/2004

ALB D A 2057

02

3

3

05/12/2004 11/03/2004

ALB Hold

Hold

11/03/2004 11/03/2004

ALB D A 1032

01

3

3

11/03/2004 03/08/2005

037 B1 58

BUS

3

3

03/08/2005 03/08/2005

SMI Hold

Hold

03/08/2005 03/08/2005

SMI H A 2030

01

4

3

03/08/2005 03/24/2005

SMI H A 2026

01

4

3

03/24/2005 03/28/2005

SMI C A 1016

01

3

3

03/28/2005 08/02/2005

037 B1 00

BUS

3

3

08/02/2005 08/02/2005

ALB Hold

Hold

08/02/2005 08/11/2005

ALB D A 1031

01

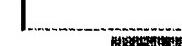
3

3

08/11/2005 Current

Prior Inmate #

BD6903

Identification:  
(Inmate #/SID/  
Phil. Photo #/SSN)



cr3dalctrweb02

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## Inmate Inquiry - Cell History

Production

DOC Info

Inmate Apps

Inmate Inquiry

Reports

Photos

JNET

Inmate #: CZ3518 ACTIVE  
Assessment  
Race: White  
SID: 149-70-82-7Name: DEFARANCO, Anthony Wayne  
DOB: 12/23/1963 Sex: Male  
FBI #: 242913AA6 PBPP #:Cust Lvl: 3 Prog Cd: Y , Z  
Housing Unit: D-A-1031-01  
Counselor: Webb, Karla JeanPerm Loc: Albion  
Temp Loc:

Community Corrections System

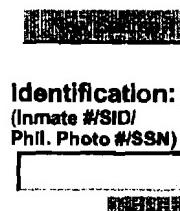
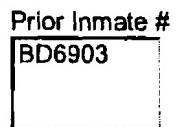
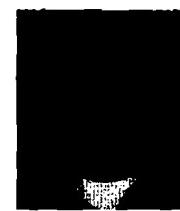
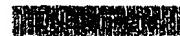
Details: YES

Green Sheet:

Problematic  
offense: YESCorrespondence Tracking  
Location Building Section  
DCCCell  
Dorm.  
No.House  
StatusSec.  
LevelCust.  
Level

Date In

Date Out



| Inmate Employment |                         |    |      |     |     |   |            |            |
|-------------------|-------------------------|----|------|-----|-----|---|------------|------------|
| PIT               | Inmate Status           |    | Hold |     |     |   |            |            |
| 029               | BT                      | 06 | BUS  |     |     | 3 | 10/20/1999 | 10/20/1999 |
| SMI               | Integrated Case Summary |    | Hold |     |     | 3 | 10/20/1999 | 10/20/1999 |
| 024               | Nick Names              | V1 | 29   | BUS |     | 3 | 10/20/1999 | 10/20/1999 |
| ALB               | RTSP                    |    | Hold |     |     |   | 10/20/1999 | 10/20/1999 |
| ALB               | J                       | B  | 1030 | 02  | 4   | 3 | 10/20/1999 | 10/26/1999 |
| ALB               | Sentencing              |    | Hold |     |     |   | 10/26/1999 | 10/26/1999 |
| ALB               | Transfer Petition       | A  | 2063 | 01  | 3   | 3 | 10/26/1999 | 12/03/1999 |
| ALB               | Unit Management         | F  | 2064 | 02  | 3   | 3 | 12/03/1999 | 03/04/2000 |
| ALB               | Visitor Tracking        |    | Hold |     |     |   | 12/03/1999 | 12/03/1999 |
| ALB               |                         | A  | 1029 | 01  | 3   | 3 | 03/04/2000 | 07/14/2000 |
| ALB               | H                       | C  | 2023 | 01  | RHU | 5 | 07/14/2000 | 07/19/2000 |
| ALB               | F                       | A  | 1029 | 01  |     | 3 | 07/19/2000 | 03/27/2002 |
| ALB               | H                       | B  | 1009 | 01  | RHU | 5 | 03/27/2002 | 04/25/2002 |
| ALB               | J                       | A  | 2058 | 01  |     | 4 | 04/25/2002 | 05/14/2002 |
| ALB               |                         |    | Hold |     |     |   | 04/25/2002 | 04/25/2002 |
| ALB               | J                       | A  | 1023 | 01  |     | 4 | 05/14/2002 | 06/24/2002 |
| ALB               | C                       | A  | 1032 | 01  |     | 3 | 06/24/2002 | 07/12/2002 |
| ALB               |                         |    | Hold |     |     |   | 07/12/2002 | 07/12/2002 |
| ALB               | H                       | D  | 2022 | 01  | RHU | 5 | 07/12/2002 | 08/15/2002 |
| ALB               | J                       | B  | 1021 | 01  |     | 4 | 08/15/2002 | 08/19/2002 |
| ALB               | D                       | A  | 2057 | 02  |     | 3 | 08/19/2002 | 08/22/2002 |
| ALB               |                         |    | Hold |     |     |   | 08/22/2002 | 08/22/2002 |
| ALB               | D                       | A  | 2057 | 01  |     | 3 | 08/22/2002 | 01/02/2004 |
| ALB               |                         |    | Hold |     |     |   | 01/02/2004 | 01/05/2004 |
| ALB               | D                       | A  | 2057 | 01  |     | 3 | 01/05/2004 | 05/12/2004 |
| ALB               |                         |    | Hold |     |     |   | 05/12/2004 | 05/12/2004 |
| ALB               | D                       | A  | 2057 | 02  |     | 3 | 05/12/2004 | 11/03/2004 |
| ALB               |                         |    | Hold |     |     |   | 11/03/2004 | 11/03/2004 |
| ALB               | D                       | A  | 1032 | 01  |     | 3 | 11/03/2004 | 03/08/2005 |
| 037               | B1                      | 58 | BUS  |     |     |   | 03/08/2005 | 03/08/2005 |
| SMI               |                         |    | Hold |     |     |   | 03/08/2005 | 03/08/2005 |
| SMI               | H                       | A  | 2030 | 01  |     | 4 | 03/08/2005 | 03/24/2005 |
| SMI               | H                       | A  | 2026 | 01  |     | 4 | 03/24/2005 | 03/28/2005 |
| SMI               | C                       | A  | 1016 | 01  |     | 3 | 03/28/2005 | 08/02/2005 |
| 037               | B1                      | 00 | BUS  |     |     |   | 08/02/2005 | 08/02/2005 |
| ALB               |                         |    | Hold |     |     |   | 08/02/2005 | 08/11/2005 |
| ALB               | D                       | A  | 1031 | 01  |     | 3 | 08/11/2005 | Current    |



cr3datctrweb02

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## Inmate Inquiry - Cell History

Production

[DOC Info](#)[Inmate Apps](#)[Inmate Inquiry](#)[Reports](#)[Photos](#)[JNET](#)

Inmate #: CZ3518 ACTIVE

Name: DEFARNO, Anthony Wayne

Cust Lvl: 3 Prog Cd: Y , Z

Perm Loc: Albion

Race: White

DOB: 12/23/1963 Sex: Male

Housing Unit: D -A -1031-01

Temp Loc:

SID: 149-70-82-7

FBI #: 242913AA6 PBPP #:

Counselor: Webb, Karla Jean

Detainers: YES

Green Sheet:

Problematic offense: YES

| Location Building Section | Cell Dorm. | Bed No. | House Status | Sec. Level | Cust. Level | Date In    | Date Out   |
|---------------------------|------------|---------|--------------|------------|-------------|------------|------------|
| PIT                       |            |         | Hold         |            |             | 08/31/1998 | 10/20/1999 |
| 029                       | B1         | 06      | BUS          |            | 3           | 10/20/1999 | 10/20/1999 |
| SMI                       |            |         | Hold         |            | 3           | 10/20/1999 | 10/20/1999 |
| 024                       | V1         | 29      | BUS          |            | 3           | 10/20/1999 | 10/20/1999 |
| ALB                       |            |         | Hold         |            |             | 10/20/1999 | 10/20/1999 |
| ALB                       | J          | B       | 1030         | 02         | 4           | 10/20/1999 | 10/26/1999 |
| ALB                       |            |         | Hold         |            |             | 10/26/1999 | 10/26/1999 |
| ALB                       | F          | A       | 2063         | 01         | 3           | 10/26/1999 | 12/03/1999 |
| ALB                       | F          | A       | 2064         | 02         | 3           | 12/03/1999 | 03/04/2000 |
| ALB                       |            |         | Hold         |            |             | 12/03/1999 | 12/03/1999 |
| ALB                       | F          | A       | 1029         | 01         | 3           | 03/04/2000 | 07/14/2000 |
| ALB                       | H          | C       | 2023         | 01         | RHU         | 5          | 07/14/2000 |
| ALB                       | F          | A       | 1029         | 01         |             | 5          | 07/19/2000 |
| ALB                       | H          | B       | 1009         | 01         | RHU         | 5          | 03/27/2002 |
| ALB                       | J          | A       | 2058         | 01         |             | 5          | 04/25/2002 |
| ALB                       |            |         | Hold         |            |             | 04/25/2002 | 04/25/2002 |
| ALB                       | J          | A       | 1023         | 01         |             | 4          | 05/14/2002 |
| ALB                       | C          | A       | 1032         | 01         |             | 4          | 06/24/2002 |
| ALB                       |            |         | Hold         |            |             | 07/12/2002 | 07/12/2002 |
| ALB                       | H          | D       | 2022         | 01         | RHU         | 5          | 07/12/2002 |
| ALB                       | J          | B       | 1021         | 01         |             | 5          | 08/15/2002 |
| ALB                       | D          | A       | 2057         | 02         |             | 4          | 08/19/2002 |
| ALB                       |            |         | Hold         |            |             | 08/22/2002 | 08/22/2002 |
| ALB                       | D          | A       | 2057         | 01         |             | 4          | 08/22/2002 |
| ALB                       |            |         | Hold         |            |             | 01/02/2004 | 01/05/2004 |
| ALB                       | D          | A       | 2057         | 01         |             | 3          | 01/05/2004 |
| ALB                       |            |         | Hold         |            |             | 05/12/2004 | 05/12/2004 |
| ALB                       | D          | A       | 2057         | 02         |             | 3          | 05/12/2004 |
| ALB                       |            |         | Hold         |            |             | 11/03/2004 | 11/03/2004 |
| ALB                       | D          | A       | 1032         | 01         |             | 3          | 11/03/2004 |
| 037                       | B1         | 58      | BUS          |            |             | 03/08/2005 | 03/08/2005 |
| SMI                       |            |         | Hold         |            |             | 03/08/2005 | 03/08/2005 |
| SMI                       | H          | A       | 2030         | 01         |             | 4          | 03/08/2005 |
| SMI                       | H          | A       | 2026         | 01         |             | 4          | 03/24/2005 |
| SMI                       | C          | A       | 1016         | 01         |             | 3          | 03/28/2005 |
| 037                       | B1         | 00      | BUS          |            |             | 08/02/2005 | 08/02/2005 |
| ALB                       |            |         | Hold         |            |             | 08/02/2005 | 08/11/2005 |
| ALB                       | D          | A       | 1031         | 01         |             | 3          | 08/11/2005 |
|                           |            |         |              |            |             |            | Current    |

Prior Inmate #  
BD6903Identification:  
(Inmate #/SID/  
Phil. Photo #/SSN)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
*Defendants' Response to Plaintiff's Second Request for Production of Documents* was  
served upon the following, by first-class mail this May 11, 2006.

Anthony DeFranco, CZ-3518  
State Correctional Institution  
At Albion  
10745 Route 18  
Albion, PA 16475

  
MARY L. FRIEDLINE  
Senior Deputy Attorney General